

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Case No.: 3:23-cv-819

JANE DOE, BY AND THROUGH HER
PARENTS JANE ROE AND JOHN ROE,

Plaintiff,

vs.

AMERICAN AIRLINES GROUP, INC. and
DOES 1-10,

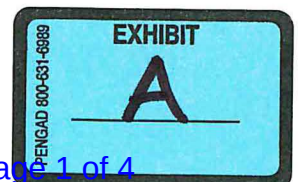
Defendants.

**PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND FIRST
REQUEST FOR PRODUCTION TO
DEFENDANT AMERICAN AIRLINES
GROUP, INC.**

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff Jane Doe, by and through her parents Jane and John Roe, hereby serves on Defendant American Airlines Group, Inc. the following First Set of Interrogatories and First Request for Production. Defendant American Airlines Group, Inc. shall answer, in writing and under oath, the Interrogatories, and shall submit a written response to the Requests for Production within 30 days after service thereof.

DEFINITIONS AND INSTRUCTIONS

1. The terms "you," "your" and "American Airlines" shall refer to Defendant American Airlines Group, Inc., and its agents, representatives, and any other person or entity acting on its behalf or at its direction.
2. The term "Plaintiff" shall refer to Plaintiff Jane Doe, by and through her parents Jane and John Roe, and her agents, representatives, and any other person or entity acting on her behalf or at her direction.
3. The term "Doe 1" shall refer to the male flight attendant working on American Airlines flight 1441 on September 2, 2023, as referenced in Plaintiff's Complaint, and his agents, representatives, and any other person or entity acting on his behalf or at his direction.
4. The term "Flight" shall refer to American Airlines flight 1441 from Charlotte, North Carolina to Boston, Massachusetts on September 2, 2023, as referenced in Plaintiff's Complaint.
5. The term "Litigation" shall refer to the above-captioned case.
6. The word "identify," when used in reference to a natural person, means to state the person's: full name, present or last known home address, email address, and telephone number;



and (b) present or last known business affiliation, including the address and telephone number.

7. The word “identify,” when used in reference to a document, means to describe the document by title or other appropriate description, and to state the document’s author, the address of its location, and the name of the individual in whose care, custody, or control the document rests.

8. The word “document” means every writing or record of every type or description whether printed, filmed, taped, recorded or reproduced by any mechanical process, or written or produced by hand that is or has been in your possession, custody or control, or of which you have knowledge, including without limitation: agreements, calendars, checks, communications, correspondence, drawings, letters, memoranda, pamphlets, pictures, plans, publications, receipts, records, releases, reports, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, summaries of records of meetings or conferences, summaries or reports of investigations, stenographic or handwritten notes, surveys, blueprints, plans, specifications, tapes, and any other writings of whatever description in any form, including but not limited to any information contained in any computer, although not yet printed out and shall include any marginal comments appearing on such document, and every copy of any such writing not an identical copy of the original or where such copy contains any commentary or notation whatsoever which does not appear on the original and any other writing. In addition to the foregoing, “document” specifically includes text or images stored in electronic form (e.g., electronic mail).

9. If you claim that any document requested to be identified or produced is no longer subject to your control, then you shall set forth the contents of such document, the location of any copies of such document, the disposition of such document, the date of the disposition of such document, the reason for such disposition, and the name of the person who ordered or authorized such disposition.

10. If you cannot fully respond to an Interrogatory or Request for Production, then you shall answer or respond to the fullest extent possible and indicate the reasons for failing to fully respond. Further, you should provide all available information regarding the request and indicate the person or persons who can more fully respond to such request.

FIRST SET OF INTERROGATORIES

1. Identify Doe 1’s full legal name, residence address, email address(s), telephone number(s), and date of birth.

ANSWER:

2. For every other American Airlines employee on the Flight, including but not limited

to flight attendants, pilots, and first officers, identify his/her full legal name, residence address, email address(s), telephone number(s), and position with American Airlines.

ANSWER:

FIRST REQUEST FOR PRODUCTION

1. Produce a complete copy of Doe 1's personnel file.

RESPONSE:

This the ____ day of _____, 2024.

LEWIS & LLEWELLYN LLP

s/ Paul T. Llewellyn
Paul T. Llewellyn, CA State Bar No. 216887
Admitted Pro Hac Vice
Erin H. Reding, CA State Bar No. 252691
Admitted Pro Hac Vice
601 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 800-0590
Facsimile: (415) 390-2127
Email: pllewellyn@lewisllewellyn.com
ereding@lewisllewellyn.com
Counsel for Plaintiff Jane Doe

JAMES, McELROY & DIEHL, P.A.

s/ John R. Buric
John R. Buric, N.C. State Bar No. 22688
John R. Brickley, N.C. State Bar No. 41126
525 N. Tryon Street, Suite 700
Charlotte, North Carolina 28202
Telephone: (704) 372-9870
Facsimile: (704) 333-5508
Email: jburic@jmdlaw.com
jbrickley@jmdlaw.com
Counsel for Plaintiff Jane Doe

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **PLAINTIFF'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT AMERICAN AIRLINES GROUP, INC.** has this date been served on counsel for American Airlines Group, Inc. via electronic mail and by depositing a copy thereof in the United States Mail, sufficient first-class postage prepaid, addressed as follows:

Kathryn Anne Grace
Wilson Elser Moskowitz Edelman & Dicker,
LLP
8444 Westpark Dr., #510
McLean, Virginia 22102
Email: Kathryn.Grace@wilsonelser.com
Counsel for American Airlines Group, Inc.

Kayla Joanne Jones
Wilson Elser Moskowitz Edelman & Dicker,
LLP
525 North Tryon Street, Suite 1600
Charlotte, North Carolina 28202
Email: kayla.jones@wilsonelser.com
Counsel for American Airlines Group, Inc.

Patrick J. Kearns
Chandler M. Teraoka
Wilson Elser Moskowitz Edelman & Dicker,
LLP
401 West A Street, Suite 1900
San Diego, California 92101
Email: Patrick.kearns@wilsonelser.com
chandler.teraoka@wilsonelser.com
Counsel for American Airlines Group, Inc.

This the ____ day of _____, 2024.

LEWIS & LLEWELLYN LLP

s/ Paul T. Llewellyn
Paul T. Llewellyn, CA State Bar No. 216887
Admitted Pro Hac Vice
Erin H. Reding, CA State Bar No. 252691
Admitted Pro Hac Vice
601 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 800-0590
Facsimile: (415) 390-2127
Email: pllewellyn@lewisllewellyn.com
ereding@lewisllewellyn.com
Counsel for Plaintiff Jane Doe

JAMES, McELROY & DIEHL, P.A.

s/ John R. Buric
John R. Buric, N.C. State Bar No. 22688
John R. Brickley, N.C. State Bar No. 41126
525 N. Tryon Street, Suite 700
Charlotte, North Carolina 28202
Telephone: (704) 372-9870
Facsimile: (704) 333-5508
Email: jburic@jmdlaw.com
jbrickley@jmdlaw.com
Counsel for Plaintiff Jane Doe